

Exhibit C

Movius, David

From: Yanchar, Georgia <GYanchar@Calfee.com>
Sent: Thursday, June 13, 2013 4:24 PM
To: Movius, David
Cc: McMullen, Dan; 'McLandrich, John'
Subject: RE: MRI's Document Production

David,

Thanks for your message. I have copied your questions, and added my responses in red below:

Scope of MRI's Production: It appears that MRI has not produced any, or in some cases just a few, documents in response to a number of Lynx's requests, including for example, Request Nos. 4-6, 11-15, 17-20, 22-64, 69-74, 78-81, 87-88, 91, 93 and 94-96. Moreover, MRI's production does not include any emails or other correspondence. Please confirm whether MRI regards its production as complete and, if not, the date on which it will produce the remaining responsive materials. **We have collected additional documents, which we are reviewing. I will have a better idea as to the timing of production next week.**

Request No. 1: While it appears that MRI has produced a number of the specimens deposited with the Copyright Office for the registrations at issue in this case, it has produced them separate from the registrations themselves and it has not included the applications themselves, all related correspondence or any documents relating to its decision to file for registration as requested by Lynx. Moreover, by producing the specimens separate from the related applications and other documents, it is unclear which specimens correlate to the various copyright registrations. Therefore, please supplement MRI's production by providing the complete applications as submitted to the Copyright Office and the related materials, as requested. **We will determine if additional, non-privileged, documents are available, and if so, produce them.**

Request No. 2: MRI's objections to this request are unfounded, and Lynx asks that they be withdrawn immediately. The source code could not be more relevant, and MRI's objection that it does not know what is meant by "source code" is without merit. Therefore, please produce the requested source code in native ASCII file format. **I suggest we meet and confer on this issue. Tomorrow at 11:30 would work for me, as you suggested. I will call your office then.**

Request No. 3: MRI's objection that it does not know what is meant by "database schema" is without merit and should be withdrawn. Moreover, a number of the documents produced in response to this request, including the multiple versions of the "database_script.sql" files produced as MRI-LYNX_003699 through MRI-LYNX_005872 and MRI-LYNX_006254 through MRI-LYNX_029026 appear to have been produced from documents that were printed and then scanned and as such are, in significant part, effectively illegible. Therefore, please re-produce these documents in native ASCII file format. **It appears the native file type for these is SQL file. Please confirm that is what you request.**

MRI-LYNX_005873: Please produce a native copy of this file with all related metadata intact. Also, please produce all other documents and material relating to this document, including but not limited to the following information referenced in this document (which are responsive to at least Request No. 13): all information provided by the "team of consultants and sales reps that have done work in Canada"; documents relating to the "client interviews in Ontario and Quebec"; documents relating to the "Canadian Pack Development"; and any documents relating to any conference or confirmation by "Shane/Ann/Pat." **I will inquire as to whether the native file and the additionally referenced documents are available.**

Corrupt Files: The files for the following documents are corrupt and cannot be opened: MRI-LYNX_003204.PDF; MRI-LYNX_003376.PDF; MRI-LYNX_003377.PDF; MRI-LYNX_003552.PDF; MRI-LYNX_003554.PDF; and MRI-LYNX_003555.PDF. Please provide non-corrupt copies of these files. **We will re-produce these documents.**

Blank File: The MRI-LYNX_003683.PDF will open, but other than the "ATTORNEYS EYES ONLY" designation and bates numbers, its contents is blank. Please either confirm that this document was intended to be blank or provide a new copy with the intended contents. **We will re-produce this document.**

We have not received any of the documents Lynx promised to produce in our May 15 joint filing by June 15. Please confirm we will receive all of them tomorrow. During our meet and confer tomorrow, we would to also like to discuss scheduling of depositions of Lynx's witnesses.

Regards,

Georgia

Georgia E. Yanchar

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From: Movius, David [mailto:dmovius@mcdonaldhopkins.com]
Sent: Thursday, June 13, 2013 3:44 PM
To: Yanchar, Georgia
Cc: McMullen, Dan; 'McLandrich, John'
Subject: MRI's Document Production

Georgia –

Based on our preliminary review of the documents produced by MRI this week, we have identified the following issues and request MRI's prompt response:

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Lynx, of course, reserves the right to identify additional issues with respect to MRI's production, and we will be addressing MRI's interrogatory responses separately. I can be available tomorrow between 11:30 am and 3 pm to meet and confer if you have any questions regarding the foregoing. Otherwise, we look forward to receiving your prompt response to each of these issues.

Regards,

Dave

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Member

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